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March 30, 2015

TSCA Confidential Business Information Center (7407M)  
WJC East; Room 6428; Attn: Section 8(e)  
U.S. Environmental Protection Agency  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460-0001

Attention: TSCA 8(e) Coordinator

RE: Benzene: Case-Control Study of MDS and Benzene in Shanghai Workers

Dear Sir or Madam:

Lyondell Chemical Company (Lyondell) hereby submits this letter pursuant to Section 8(e) of the Toxic Substances Control Act (TSCA) and EPA's 1991 Section 8(e) Reporting Guide because it includes findings that EPA may consider reportable. Lyondell has not made a determination as to whether a significant risk of injury to health or the environment is actually presented by the findings.

A case-control epidemiological study to investigate the relationship between estimated exposure to benzene (CAS RN 71-43-2) and the major Myelodysplastic Syndrome (MDS) subtypes in patients in hospitals in Shanghai, China was conducted under contract to the American Petroleum Institute. The primary contractor for this study was ExxonMobil Biomedical Sciences, Inc., with sub-contracted support from Richard D. Irons (affiliated with University of Colorado), Xiao Qin Wang (affiliated with Fudan University), and TWA8HR Occupational Hygiene Consulting.

The authors of the draft report entitled: "Case-Control Study of MDS and Benzene in Shanghai Workers" reported that a specific MDS subtype, namely Refractory Cytopenia with Multilineage Dysplasia (RCMD), showed a statistically significant link to benzene exposure. RCMD showed statistically significant odds ratios greater than 1 for the three exposure groups in this study estimated to have the highest exposures. No other MDS subtype showed a relationship with benzene, including refractory anemia with excess blasts (RAEB), the type that has higher propensity to progress to acute myeloid leukemia (AML). Residence on a farm (positive) and diabetes (negative) were other independent risk factors for most MDS subtypes.

This report has been compiled based on information available as of the date of filing. Lyondell reserves the right to supplement the data contained in this report, and to revise and amend any conclusions drawn there from, as necessary.

Should you have any questions or require additional details, please do not hesitate to call me at 713-309-1582 or by e-mail at [betsy.duncan@LYB.com](mailto:betsy.duncan@LYB.com).

Sincerely,

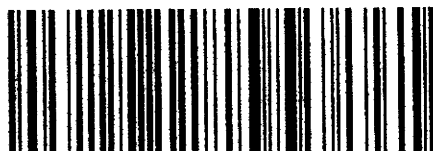
A handwritten signature in black ink that reads "Betsy Duncan". The signature is fluid and cursive, with a long horizontal flourish extending to the right.

Betsy Duncan  
Senior Product Steward – Global Chemical Control  
Corporate TSCA Coordinator

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